



November 10, 2005

Mr. Arthur Neal
Director of Program Administration
United States Department of Agriculture
1400 Independence Avenue S.W.
Washington, DC 20250

Reference: TMD-04-01

Dear Mr. Neal:

The International Fresh-cut Produce Association (IFPA) is the leading global advocate and business resource for the makers of pre-cut, pre-washed, packaged fruits and vegetables and their allied suppliers. As the only organization representing the \$12 billion fresh-cut produce industry, IFPA's members include fresh-cut produce processors, including organic, as well as packaging and machinery equipment manufacturers, packaging/materials suppliers and technology solution providers. Our uniquely interdependent membership fosters the collective power of the fresh-cut sector. Founded in 1987, IFPA has a robust membership of nearly 500 fresh-cut processors, distributors and retail/foodservice produce buyers, as well as companies that supply equipment, goods and services to the fresh-cut industry. Our diverse membership reflects the excitement and innovation behind this dynamic, fast-growing industry, and includes small, family-owned businesses, mid-sized regional processors and large, multi-national brand leaders.

Peracetic acid, also known as peroxyacetic acid, is an important tool in the fresh-cut industry, used in sanitation of food contact surfaces as well as in produce wash water to control contamination by pathogens such as *E. coli* O157:H7. In these applications, peracetic acid is transferred to the produce in insufficient amounts to be considered an ingredient. Even when transference occurs, the material rapidly degrades to water and acetic acid (vinegar). Thus, although peracetic acid is a synthetic, it would appear to comply with the spirit of the National Organic Program as a material that should be permitted in and/or on organic products. This was clearly the intent of the recommendations of the National Organic Standards Board in their unanimous vote in November 2000 to place peracetic acid on the National List of Materials.

Therefore we respectfully request the National Organic Program remove the prohibition for peracetic acid in handling agricultural products labeled "organic" and to change the language in the proposed amendments to 7 CFR Part 205 (*Federal Register* Vol. 70, No. 179, Friday, September 16, 2005) to the following:

"Peracetic acid/Peroxyacetic acid (CAS # 79-21-0)—for use in wash and/or rinse water according to FDA limitations. For use as a sanitizer on food contact surfaces."

We appreciate your immediate action relative to our request herein.

Sincerely,

A handwritten signature in black ink that reads "David E. Gombas".

David E. Gombas, Ph.D.
Vice President Technical Services